

June 29, 2005

US. Dept. of Agriculture
Regulatory Analysis and Development
PPD, Animal and Plant Health Inspection Service
Station 3C71, 4700
River Road Unit 118
Riverdale, MD 20737-1238



Partners with Mother Nature.

Re: National Animal Identification System (NAIS);
Docket No. 05-015-1

To Whom It May Concern:

The Pacific Coast Shellfish Growers Association is opposed to the inclusion of shellfish aquaculture in the National Animal Identification System (NAIS). The NAIS would be redundant of existing programs for the protection of the shellfish food resource and consumer safety. It would be an unnecessary burden on the shellfish industry. Our specific reasons for opposing the inclusion of the shellfish aquaculture industry are as follows.

1. The existing National Shellfish Sanitation Program (NSSP), operated under the jurisdiction of the U.S. Food and Drug Administration, already requires very strict and detailed identification and tracking of food shellfish animals. The national animal health program, adopted by our industry on the West Coast, provides further means for identifying and tracking shellfish for animal disease control.
2. The US aquaculture industry is small, unlike the poultry or beef industries, which are major food sources, so if there were a disease outbreak, whether intentional or unintentional, it would not have a major social or economic impact.
3. There are very few, if any, zoonotic diseases of shellfish.

Thank you for your time.

Sincerely,


Robin Downey
Executive Director

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Pacific Coast Shellfish Growers Association

120 State Avenue NE #142 ♦ Olympia, Washington 98501 ♦ (360) 754-2744 ♦ Fax 754-2743 ♦ pcsga@pcsga.org